

The Hon. Ricardo S. Martinez
Chief United States District Judge

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DANIEL RAMIREZ MEDINA,
Plaintiff,
v.
U.S. DEPARTMENT OF HOMELAND
SECURITY, *et al.*,
Defendants.

Case No. 2:17-cv-00218-RSM-JPD

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS TO RESPOND TO
PLAINTIFF'S THIRD AMENDED
COMPLAINT**

Noted for Consideration: July 8, 2019

Pursuant to LCR 10(g), Defendants U.S. Department of Homeland Security, *et al.*, and Plaintiff Daniel Ramirez Medina (together, "the Parties"), hereby stipulate to seek an order of the Court extending the time for Defendants to answer, plead, or otherwise respond to Plaintiff's Third Amended Complaint [ECF No. 140, filed May 30, 2019] by four weeks. Pursuant to this Court's order of June 5, 2019, granting the Parties' first stipulated extension, Defendants' current

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U.S. Department of Justice, Civil Division
Office of Immigration Litigation
P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044
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1 response deadline is July 10, 2019 [ECF No. 146]. Under the Parties' stipulation, Defendants'
2 new response deadline would be August 7, 2019.

3 Good cause exists to extend Defendants' deadline where counsel for Defendants' are
4 preparing for a Ninth Circuit oral argument on July 11, 2019, and have additional deadlines in
5 two other cases, as well as personal commitments during the week of July 15, 2019.

6 Counsel for Plaintiff support this extension of Defendants' deadline to respond in order to
7 first give the Court the opportunity to rule on Mr. Ramirez's Motion for Second Preliminary
8 Injunction, or, in the Alternative, to Compel Compliance with Preliminary Injunction Order
9 [ECF No. 147], rather than burden the Court with a second motion presenting some overlapping
10 arguments.

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13 It is so ordered, this ____ day of July, 2019.

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The Hon. Ricardo S. Martinez
Chief United States District Judge
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1 DATED: July 9, 2019

Respectfully submitted,

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Acting Assistant Attorney General

/s/ James J. Walker

JAMES J. WALKER

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4 Director

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 9, 2019, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document should automatically be served this day on all counsel of record *via* transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ James J. Walker

JAMES J. WALKER

Trial Attorney

U.S. Department of Justice